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Subject: DEQ's comment re: EPA's draft FS Guidance
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Chip & Eric,

Nice job putting together this draft guidance. I understand 1 of your objectives for this document is get EPA's initial position on what the FS should look like out to the LWG to facilitate discussion & agreement. Your document meets that objective. I also understand PMX is preparing a more detailed document guiding the FS. We're looking forward to receiving that document.

Here are DEQ's comments on EPA's 3/10/08 draft "EPA Guidance on the PH FS".

1) Technical Issues (page 3)- EPA lists 3 key technical issues that require thorough discussion with the LWG. We suggest including 4 additional technical issues: 1) dredging methods & engineering controls, 2) net risk reduction, 3) cleanup to baseline levels (Portland Harbor-specific ambient background levels) versus risk-based & ARAR-based levels, & 4) "green remediation" factors (e.g., the extent that remedial alternatives minimize engine-related fuel use and air emissions).

2) Logistical Issues (page 3)- EPA also lists 2 key logistical issues that require thorough discussion with the LWG. We suggest including 1 additional logistical issue, sequencing of in-water actions.

3) FS Process, 1st bullet (page 3)- While DEQ agrees that MNR, capping, and removal are the "major" remedial approaches; in-situ and ex-situ sediment treatment should be considered in the FS.

4) Typos (pages 4 & 6)- The 1st sentence in the section titled "Remedial Action Objectives" on page 4 is repeated. The words "cost, effectiveness and implementability." are repeated in the end of the section titled "Initial Screening of Remedial Technologies" on page 6.

5) PRGs (page 5)- It is not clear what "temporal realities" refers to.

6) Detailed Evaluation of Remedial Action Alternatives (page 7)- The last paragraph describes selection of SMA-specific alternatives to develop a site-wide alternative. DEQ agrees with this approach, and the degree of SMA-specific menu restrictions should be further discussed with the LWG.

7) Volumes (Figure 1, Section 3, Identify AOPCs or Section 4, Develop SMAs)- If EPA plans to direct the LWG to estimate volumes of media to which general response actions might be applied..., this is where that direction should be.

8) Technologies Types & Technology Process Options (Figure 1, Section 5, Initial Technology Screen)- Rename "Section 5) a)" from "Technologies" to "Technology Types & Technology Process Options".

9) Assemble Technologies into Alternatives (Figure 1, Section 6c)- Technologies that screen-in from the Initial Technology Screen should be assembled into a range of protective alternatives for screening against effectiveness, implementability, & cost.

10) Debris (Figure 1, Section 6d)- Evaluation of potential debris impacts to sediment remedial technologies should be included in item 6d for dredging and capping.

11) Treatability Studies (Figure Section 6)- If EPA anticipates the need for any additional treatability studies, they should be conducted before the detailed evaluation of RAAs in Section 7.

12) Protection (Figure 1, Section 7 b)- The referenced outline section should read "Evaluate overall protection of human health & the environment".

13) State Acceptance & Community Acceptance (Figure 1)- The outline should include 2 additional criteria sections: 1) State acceptance, & 2) community acceptance.

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